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May 6, 2015

VIA ECF

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: Chau v. Hartford Life Ins. Co., 14 Civ. 8484 (S.D.N.Y. 2014) (GHW)

Dear Judge Woods:

I represent Plaintiff, Elizabeth Chau (“Chau”), in the above-referenced matter (the “Action”). I respectfully submit this letter, in accordance with Rules 1.A. & 1.E. of Your Honor’s Individual Rules of Practice in Civil Cases, to request an extension of the deadline for Plaintiff’s response to Defendant’s, Hartford Life, Ins. Co. (“Hartford”), partial motion to dismiss Counts II through VII of the Amended Complaint (“MTD”) in the Action.

Pursuant to Rule 1.E., I respectfully request the extension, as follows:

- (1) Chau’s current response date is May 19, 2015. Hartford’s response or reply is due seven days after service of Chau’s response.
- (2) There have been no previous requests for adjournment or extension of the time to respond.
- (3) The reason for the request is workload scheduling difficulties arising from deadlines in other matters and a personal matter (serious medical conditions requiring hospitalization and a surgical procedure for my elderly mother).
- (4) Counsel for Hartford consents to this request.
- (5) Counsel for Hartford consents to the request with the following proposed rescheduled deadlines:
 1. Chau’s time to respond to Hartford’s MTD extended from May 19, 2015 to June 2, 2015 (two weeks).
 2. Hartford’s time to respond or reply extended to June 12, 2015 (ten days after service of Chau’s response).

Thank you for your consideration of this matter.

Respectfully submitted,

THE RANDO LAW FIRM P.C.

By: s/ _____
Robert J. Rando (RR-5765)

RJR:lr

cc: Michael H. Bernstein, Esq., counsel for Defendant, Hartford (via ECF)